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March 7, 2022

BY ECF

Honorable Magistrate Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Terkeltaub v. United States of America*
Civil Action No.: CV-20-3938

Dear Honorable Judge Scanlon:

My office represents the plaintiffs in the above reference action. The instant action is a FTCA medical malpractice case involving a related New York State Kings county action.

The parties respectfully request an extension of the present deadlines. The extension is needed because we have received new information regarding the plaintiff's injury and must supplement our responses and provide the defense with this new information accordingly.

Specifically, the parties request that the present deadline for completion of all discovery, including depositions, expert work, and dispositive motions be adjourned from June 30, 2022 to August 29, 2022. The parties further request that the Pre-Trial Order deadline be adjourned from August 31, 2022 to October 31, 2022.

The parties thanks Her Honorable Madam-for considering this request.

Respectfully submitted,

Diana M.A. Carnemolla

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